

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

ORDER GRANTING FIVE HUNDRED SIXTIETH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR WHICH THE OBJECTING  
DEBTORS ARE NOT LIABLE

Upon the *Five Hundred Sixtieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims for which the Objecting Debtors are Not Liable* (the “Five Hundred Sixtieth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and with the Commonwealth, “Objecting Debtors”), dated January 27, 2023, for entry of an order disallowing in their entirety certain claims filed against the

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Five Hundred Sixtieth Omnibus Objection.

Objecting Debtors, as more fully set forth in the Five Hundred Sixtieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Sixtieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Sixtieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Sixtieth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Commonwealth and/or ERS are not liable; and the Court having determined that the relief sought in the Five Hundred Sixtieth Omnibus Objection is in the best interest of the Objecting Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Sixtieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Sixtieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 23423 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Sixtieth Omnibus Objection**

Five Hundred Sixtieth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALICEA, JENNIFER PO BOX 363901 SAN JUAN, PR 00936-3901	05/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	19589	\$139,968.58
Reason: Information provided states that the claim is related to case SJ2020CV06210, which was withdrawn by the creditor on 02/25/2022.						
2	BATISTA SERRANO, ENID M. HC-01 BOX 1070-M ARECIBO, PR 00612	06/29/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	126174	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of case number SJ-2017-CV-00542, but a judgment has since been issued withdrawing the claimant from the case. Therefore, there is no further basis for liability.						
Claim #126174 also contained on Exhibit A to the 337th Omnibus Claims Objection for Claims to Be Reclassified.						
3	CAPPA DELGADO, NANCY P.O. BOX 336433 PONCE, PR 00733-6433	06/20/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	74612	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of case number SJ-2017-CV-00542, but a judgment has since been issued withdrawing the claimant from the case. Therefore, there is no further basis for liability.						
4	COLON MALDONADO, CARMEN G CALLE 3 H-3 FOREST HILL BAYAMON, PR 00959	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	80160	\$3,000.00*
Reason: Proof of claim purports to assert liability on the basis of case number KAC-2003-4295, but the case has since been dismissed and there is no further basis for liability.						
5	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD SUITE 420 LAKE WORTH, FL 33467	05/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	20364	\$1,500.00*
Reason: Proof of claim purports to assert liability on the basis of case number ISCI-2015-1067, but the case has since been withdrawn by the claimant and there is no further basis for liability.						

Five Hundred Sixtieth Omnibus Objection  
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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
6	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD, SUITE 420 LAKE WORTH, FL 33467	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24242	\$8,038.90
Reason: Proof of claim purports to assert liability on the basis of property seized through asset forfeiture but the books and records of the Commonwealth indicate that the seized property has been returned and there is no further basis for liability.						
7	DAT@ACCESS COMMUNICATIONS INC. HÉCTOR FIGUEROA-VINCENTY 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	06/01/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	34656	\$63,000.00
Reason: Invoice(s) totaling \$15,750.00 were paid via EFT 00048329 on 08/14/2017. Additionally, proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but liabilities totaling \$47,250.00 fail to provide sufficient supporting documentation for asserting the liabilities against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has valid liabilities against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
8	GUZMAN CORTES, CARMEN BO MORA GUERRERO BUZON 289 CALLE 7 ISABELA, PR 00662	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	115088	\$2,400.00*
Reason: Proof of claim purports to assert liability on the basis of case number KAC-2003-4295, but the case has since been dismissed and there is no further basis for liability.						
9	LOPEZ RIVERA, MARIA DEL C. APARTADO 957 VILLALBA, PR 00766	06/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	94315	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of case number SJ-2017-CV-00542, but a judgment has since been issued withdrawing the claimant from the case. Therefore, there is no further basis for liability.						

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
10	MENDEZ PEREZ, GEORGINA URB COLINAS G 4 CALLE 6 YAUCO, PR 00698	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	150864	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of case number KAC-2003-4295, but the case has since been dismissed and there is no further basis for liability.						
11	ORTIZ ORTIZ, MARGARITA R RR 2 BOX 7104 GUAYAMA, PR 00784	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	147932	\$12,000.00*
Reason: Proof of claim purports to assert liability on the basis of case number SJ-2017-CV-00542, but a judgment has since been issued withdrawing the claimant from the case. Therefore, there is no further basis for liability.						
12	PEREZ RODRIGUEZ, MARIBEL PUEBLO NUEVO C # 22 YAUCO, PR 00698	06/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	81136	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of case number KAC-2003-4295, but the case has since been dismissed and there is no further basis for liability.						
13	PEREZ TORRES, ELIZABETH URB. SANTA ELEANA 2 B-16 CALLE ORIQUIDEA GUAYANILLA, PR 00656	06/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	93765	\$10,000.00*
Reason: Proof of claim purports to assert liability on the basis of case number KAC-2003-4295, but the case has since been dismissed and there is no further basis for liability.						
14	ROBLES RODRIGUEZ, CARLOS LUIS BO LOS CROABAS CARR 987 HC67 BOX 21591 FAJARDO, PR 00738	09/20/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	170820	\$13,800.00
Reason: Proof of claim purports to assert liability on the basis of case number NSCI-2003-00282, but the case has since been dismissed and there is no further basis for liability.						



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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
15	ROBLES RODRIGUEZ, RODOLFO HC 67 BOX 21591 BO LAS CROABAS CARR 987 FAJARDO, PR 00738-9499	09/20/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	170834	\$16,200.00
Reason: Proof of claim purports to assert liability on the basis of case number NSCI-2003-00282, but the case has since been dismissed and there is no further basis for liability.						
16	RODRIGUEZ LEON, RUTH I 6602 DOREL STREET PHILADELPHIA, PA 19142	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	73329	\$11,498.00*
Reason: Proof of claim purports to assert liability on the basis of case number SJ-2017-CV-00542, but a judgment has since been issued withdrawing the claimant from the case. Therefore, there is no further basis for liability.						
17	RODRIGUEZ RAMOS, ISMAEL 6 NOBLEZA V. ESPERANZA CAGUAS, PR 00727	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	63539	\$8,594.09*
Reason: Proof of claim purports to assert liability on the basis of case number SJ-2017-CV-00542, but a judgment has since been issued withdrawing the claimant from the case. Therefore, there is no further basis for liability.						
18	ROSADO MORALES, AYMEE DEL C. YADIRA ADORNO DELGADO 1605 AVE. PONCE DE LEON STE 600 SAN JUAN, PR 00909	06/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	46213	\$1,350,000.00*
Reason: Proof of claim purports to assert liability on the basis of case number FBCI-2010-01417, but the case has since been dismissed and there is no further basis for liability.						
19	TOLEDO TORRES, JULYSBETTE D. PO BOX 1989 HATILLO, PR 00659	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	65152	\$1,500.00
Reason: Proof of claim purports to assert liability on the basis of case number KAC-2003-4295, but the case has since been dismissed and there is no further basis for liability.						

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					ASSERTED CLAIM AMOUNT
NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	
20 TORRES ROSADO, JULIO PO BOX 100 43 CIDRA, PUERTO RICO 00739 CIDRA, PR 00739	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	54400	\$12,375.00*
Reason: Proof of claim purports to assert liability on the basis of case number SJ-2017-CV-00542, but a judgment has since been issued withdrawing the claimant from the case. Therefore, there is no further basis for liability.					
21 URBINA REYES, GLORIMAR URB L'ANTIGUA CALLE 4 VIA PARIS LH-105 TRUJILLO ALTO, PR 00976	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18424	\$61,000.00*
Reason: Proof of claim purports to assert liability on the basis of an arbitration proceeding against the Commonwealth regarding accrued but unpaid wages and/or pension, but the administrative case is closed, and no amounts were owed as part of the resolution. Additionally, Proof of Claim asserts liability on the basis of a tax refund. The records of the Department of Treasury show such refund has been paid in full.					
TOTAL					\$1,714,874.57*